

### **REMARKS**

Reconsideration and allowance of the subject application are respectfully requested. By this amendment, Applicant has amended claims 1 and 8. Claims 1-16 and 27 are all the claims pending in the application. In response to the Office Action, Applicant respectfully submits that the claims define patentable subject matter.

#### **I. Overview of the Office Action**

Claim 8 is rejected under 35 U.S.C. § 102(e) as allegedly being anticipated by Nakamura et al. (U.S. patent No. 7,154,452, hereafter "Nakamura"). Claims 1-4 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Nakamura in view of newly cited Gatson (U.S. Patent No. 5,956,048). Claims 15 and 16 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Nakamura in view of Someya et al. (U.S. Patent No. 6,759,996). Claims 5-7 are objected to as being dependent upon a rejected base claim, but would be allowable if rewritten in independent form including all of the limitations of the base claim and any intervening claims. Claims 9-14 are allowed. Applicant respectfully traverses the prior art rejections.

#### **II. Prior Art Rejections**

##### **A. Rejection of claim 8 under 35 U.S.C. § 102(e)**

In the previous Office Action dated May 16, 2007, the Examiner asserted that Nakamura discloses all of the features of independent claim 8.

In the Previous Amendment filed on August 16, 2007, Applicant submitted that there is no teaching or suggestion in Nakamura of writing image data expressing an image which has already been written in the plurality of display devices in display devices located one surface

behind display devices in which the image data is already written; and writing the latest image data designated to be written in a display device located at a front-most surface of the plurality of thin display devices as required by independent claim 8.

In response, the Examiner asserts:

Although, Nakamura does not teach “images which have already been displayed on the electronic papers 10 are sequentially sent to the electronic papers on the rear side without removing the electronic papers from the holding stand”. The claim language in no way conveys that the displays cannot be removed in order to perform a write designation, and based on the rejection above for claim 8 image that has already been written would be respectfully located one surface behind thin display devices in which the image data has already been written.<sup>2</sup>

Applicant respectfully disagrees with the Examiner’s position. To anticipate a claim, the reference must teach every element of the claim. See MPEP § 2131. Moreover, “[t]he identical invention must be shown in as complete detail as is contained in the ... claim.” *Richardson v. Suzuki Motor Co.*, 868 F.2d 1226, 1236, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989), cited in MPEP § 2131.

The Examiner acknowledges that Nakamura does not teach or suggest “writing image data expressing an image which has already been written in the plurality of thin display devices in thin display devices respectively located one surface behind thin display devices in which the image data is already written”, as recited in the claim. However, the Examiner attempts to cure this conceded deficiency by apparently asserting that changing the order of the electronic pages would achieve the same function of “writing image data expressing an image which has already

---

<sup>2</sup> Page 8 of the Office Action dated November 1, 2007.

been written in the plurality of thin display devices in thin display devices respectively located one surface behind thin display devices in which the image data is already written”, as claimed.

With this feature of claim 8, images which have already been displayed on the electronic papers 10 are sequentially sent to the electronic papers on the rear side without removing the electronic papers from the holding stand. Display control is performed to display the latest image on the front-most electronic. Accordingly, a recently written image which is frequently used can be displayed on the front-most electronic paper.

Nakamura discloses that in instances where the electronic paper 10 is detached from a specific terminal 21 and attached to another terminal, the display data is not displayed in numerical order (column 14, lines 33-37). An attachment detection means 30 notifies a display luminescence control means of the terminal to which the electronic paper is attached, and the display luminescence control means reads the display data from storage means 160 and displays the data on the basis of the notification of the terminal attachment (column 14, lines 30-57).

However, nowhere does Nakamura disclose “writing image data expressing an image which has already been written in the plurality of thin display devices in thin display devices respectively located one surface behind thin display devices in which the image data is already written”, as recited in the claim.

Accordingly, Applicant respectfully submits that claim 8 should be allowable because the cited reference does not teach or suggest all of the features of the claim.

**B. Rejection of claims 1-4 under 35 U.S.C. § 103(a)**

The Examiner asserts that Nakamura discloses all of the features of independent claim 1 except for the feature “wherein a front surface of the holding stand has a U-shaped section at both of side ends and a lower end”. The Examiner thus relies on Gaston to allegedly cure this deficiency. Applicant respectfully submits that the claimed invention would not have been rendered obvious in view of the cited references.

Gaston discloses an electronic book system which includes a portable display unit and a downloading stand which receives the unit (the Abstract). However, FIG. 6 of Gaston clearly discloses that only one side of the stand 66 has a U-shaped section. Applicant respectfully submits that there is no teaching or suggestion in Gaston of “a front surface of the holding stand has a U-shaped section at both of side ends and a lower end”, as recited in the claim.

Accordingly, Applicant respectfully submits that claim 1 should be allowable because the cited reference does not teach or suggest all of the features of the claim. Claims 2-4 should also be allowable at least by virtue of their dependency on independent claim 1.

**C. Rejection of claims 15 and 16 under 35 U.S.C. § 103(a)**

With respect to independent claim 15 and analogous independent claim 16, the Examiner acknowledges that Nakamura does not teach or suggest:

pages of the thin display devices are connected in series with each other  
and for sequentially transmitting the image data to the plurality of thin display  
devices, wherein:

the host device includes

an adding unit for adding, to the image data, page information expressing a page to be displayed in the plurality of thin display devices held as a plurality of pages, and

a transmission unit for transmitting the image data, to which the page information has been added by the adding unit, to the thin display devices; and each of the thin display devices includes

a receiving unit for receiving the image data to which the page information has been added,

a decision unit for comparing the page information of the image data received by the receiving unit and page setting information preset for each thin display device depending on the series connections between the thin display devices with each other to decide whether or not the page information and the page setting information coincide with each other,

a control unit for controlling the display of the display units based on a decision result of the decision unit, and

a sending unit for sending the image data, to which the page information has been added, to the thin display device of the subsequent page or the host device.

The Examiner thus relies on Someya to cure these deficiencies. Applicant respectfully submits that claim 15 and analogous claim 16 would not have been rendered obvious in view of the cited references.

The Examiner alleges that Someya discloses an adding unit for adding, to the image data, page information expressing a page to be displayed in the plurality of thin display devices held as a plurality of pages, and a transmission unit for transmitting the image data, to which the page information has been added by the adding unit, to the thin display devices; and each of the thin display devices includes a receiving unit for receiving the image data to which the page information has been added, a decision unit for comparing the page information of the image

data received by the receiving unit and page setting information preset for each thin display device depending on the series connections between the thin display devices with each other to decide whether or not the page information and the page setting information coincide with each other, a control unit for controlling the display of the display units based on a decision result of the decision unit, and a sending unit for sending the image data, to which the page information has been added, to the thin display device of the subsequent page or the host device”, as recited in claim 15 and analogously recited in claim 16. Applicant respectfully disagrees with the Examiner’s position.

Someya discloses an image signal generating unit 1 which supplies images to display units having different unit numbers. Index information, which designates a display unit by which an image is to be displayed, is embedded in an image signal. Each display unit compares its unit number with the index signal to select displayable frames of the image signal.

Applicant respectfully submits that there is no teaching or suggestion in Someya “a decision unit for comparing the page information of the image data received by the receiving unit and page setting information preset for each thin display device depending on the series connections between the thin display devices with each other to decide whether or not the page information and the page setting information coincide with each other”, as required by the claims.

The Examiner cites column 6, lines 61-64 of Someya as allegedly disclosing this feature of the claims. However, this cited portion of Someya merely discloses how an index tester 11 tests the bits at a bit position corresponding to a unit number output by a unit number setting device 10. Nowhere does this portion (or any other portion) of Someya disclose “a decision unit

for comparing the page information of the image data received by the receiving unit and page setting information preset for each thin display device depending on the series connections between the thin display devices with each other to decide whether or not the page information and the page setting information coincide with each other”, as required by the claims.

Further, Applicant respectfully submits that there is no teaching or suggestion in Someya of “a control unit for controlling the display of the display units based on a decision result of the decision unit, and a sending unit for sending the image data, to which the page information has been added, to the thin display device of the subsequent page or the host device”, as required by the claims. Since page information is not added to the image data in the system of Someya, Someya cannot disclose sending image, data to which page data has been added, to the display units, as claimed.

From the Abstract and the descriptions in column 4, line 52 to column 5, line 4 of the specification of Someya, it is understood that multiple image display units have different unit numbers. By comparing the unit number with an index signal embedded in an image signal, each image display unit can display different images using a signal line. The unit number is set by a unit number setting device 10 in each unit (see Fig. 5), which is described as a "DIPswitch" in the specification.

On the other hand, in the claimed invention, each thin display device has a receiving unit, a sending unit, and an updating unit. The updating unit updates page information, and then the information is sent to the subsequent pages or the host device.

In other words, in the claimed invention, updating of the page data is carried out at each display device; hence it is unnecessary for each display device to have individual IDs (the unit

numbers) and the unit number setting device as disclosed in Someya.

Further, because there is no requirement for individual IDs, in the instant invention, the display order can be matched to the existing arrangement order of the thin display devices.

Additionally, in Someya, the image display unit shown in Fig. 5 includes a receiving unit ("image signal receiving circuit"); however, the description in column 4, line 52 to column 5, line 4 of Someya does not disclose, teach or suggest any configurations including a sending unit which sends the received data as disclosed in the instant invention.

Further, although Figs. 26 and 30-32 in Someya disclose an image signal output circuit and an output terminal, they merely receive signals and relay the same signals to all display units. Accordingly, due to its configuration, the instant invention can achieve an appropriate display order, and the display devices can be removed and/or added flexibly.

Accordingly, Applicant respectfully submits that claims 15 and 16 should be allowable because the cited references do not teach or suggest all of the features of the claims, and one of ordinary skill in the art would not have been motivated to modify or combine the reference to produce the claimed invention.

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.



The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

Respectfully submitted,

/Mark E. Wallerson/

SUGHRUE MION, PLLC  
Telephone: (202) 293-7060  
Facsimile: (202) 293-7860

WASHINGTON OFFICE

**23373**

CUSTOMER NUMBER

---

Mark E. Wallerson  
Registration No. 59,043

Date: February 28, 2008